

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709
DAVID KIEBLER
LAUREN IBANEZ
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
david.kiebler@usdoj.gov
Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GEORGE PEREZ

Defendant.

Case No.: 2:22-cr-204-JCM-MDC

Stipulation for a Protective Order

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the defendant, George Perez, the public, or any third party not directly related to this case, any and all unredacted discovery (the “Protected Material”) in this case. The parties state as follows:

1. On September 28, 2022, a federal grand jury returned an indictment charging Defendant, George Perez, with robbery and firearm offenses. ECF No. 24.
2. The government produced discovery to Perez’s appointed attorneys, the Federal Public Defender for the District of Nevada. The government redacted the names and personally identifiable information of the numerous victims and witnesses.
3. On January 3, 2024, Judge Farenbach granted the Federal Public Defender’s

1 motion to withdraw as counsel and appointed Perez's current counsel, Jennifer
2 Waldo.

3 4. The government will produce the Las Vegas Metropolitan Police Department's
4 unredacted file to Perez's current counsel. The government believes that much of the
5 information in that file is cumulative to the discovery previously produced in
6 redacted form.

7 5. In order to prevent dissemination of the Protected Material, the parties intend to
8 restrict access to the Protected Material in this case to the following individuals:
9 attorneys for all parties and any personnel that the attorneys for all parties consider
10 necessary to assist in performing the attorneys' duties in the prosecution or defense
11 of this case, including investigators, paralegals, experts, support staff, interpreters,
12 and any other individuals specifically authorized by the Court (collectively, the
13 "Covered Individuals"). The Defendant, George Perez, shall not obtain a copy of the
14 Protected Material. The Defendant may, however, review the Protected Material in
15 the presence of his attorney or the attorney's staff.

16 6. Without leave of Court, the Covered Individuals shall not:

17 a. make copies for, or allow copies of any kind to be made by any other person
18 of the Protected Material in this case or permit dissemination of the Protected
19 Material, to include leaving a copy of the Protected Material with the
20 Defendant unattended;

21 b. allow any other person to watch, listen, or otherwise review the Protected
22 Material;

23 c. use the Protected Material for any other purpose other than preparing to
24 defend against or prosecute the charges in the indictment or any superseding

1 indictment arising out of this case; or

2 d. attach the Protected Material to any of the pleadings, briefs, or other court
3 filings except to the extent those pleadings, briefs, or filings are filed under
4 seal, or appropriately redact all PII.

5 7. Nothing in this stipulation is intended to restrict the parties' use or introduction of the
6 Protected Material as evidence at trial or support in motion practice.

7 8. The parties shall inform any person to whom disclosure may be made pursuant to this
8 order of the existence and terms of this Court's order.

9 DATED: August 6, 2024

10 Read and Agreed:

11 JASON M. FRIERSON
12 United States Attorney

13 /s/ David Kiebler
14 David Kiebler
15 Lauren Ibanez
16 Assistant United States Attorneys

17 Counsel for Defendant, George Perez

18 /s/ Jennifer Waldo
19 Jennifer Waldo

20 **IT IS SO ORDERED:** The parties must use the correct case number on all future filings.

21 8-6-24

22 Date

23 
24 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge